



November 14, 2019

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

Re: Notice of *Ex Parte* Communication, CG Docket No. 05-231, RM-11848

Dear Ms. Dortch:

On November 12, 2019, Joshua Pila of Meredith Corporation, Townsend Davis of ABC, Inc., Angela Ball of NBC Universal, Robert Folliard of Gray Television, Inc. and the undersigned of the National Association of Broadcasters, met with Diane Burstein, Suzy Rosen Singleton, Eliot Greenwald and Debra Patkin of the Consumer and Governmental Affairs Bureau to discuss certain issues raised in the above-captioned proceedings.

Specifically, we discussed existing and potential best practices regarding the creation of closed captions created using automated speech recognition (ASR) software. NAB noted that some stations are using ASR on an experimental basis in some markets, and doing so in close coordination with software developers. We also explained that broadcasters have every incentive to provide good quality captions in order to retain the loyalty of viewers. NAB encouraged the Commission not to take any actions that might impede the development of ASR. One option to further develop pre-creation best practices would be to engage the Commission's Disability Advisory Committee (DAC) to recommend best practices for the training and preparation of ASR software so that ASR continues to develop consistently with the caption quality standards set forth in 2014 Caption Quality Order, *i.e.*, accuracy, synchronicity, completeness and placement.<sup>1</sup>

We also discussed enhanced Electronic Newsroom Technique (ENT) procedures for local news programming. First, we noted that NAB and broadcasters are actively engaged in a working group of the DAC that is currently considering recommendations to the full DAC to further improve ENT. We appreciate the Commission's ongoing support for ENT as the valuable, efficient captioning option it provides for stations in small- and mid-sized markets. We also described several efforts underway to expand the education of broadcasters and consumers regarding ENT, particularly the challenges related to captioning local news weather segments.

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<sup>1</sup> *Closed Captioning of Video Programming, TDI Petition for Rulemaking, Report and Order, Declaratory Ruling, and Second Further Notice of Proposed Rulemaking*, 29 FCC Rcd 2221 at ¶¶ 26-33 (2014) (2014 Caption Quality Order).

We also noted that NAB has already taken steps to foster engagement between the deaf and hard of hearing community and television stations. Specifically, NAB has worked with the Michigan Association of Broadcasters (MAB) and the Alabama Broadcasters Association (ABA) in a pilot project to invite representatives of the Deaf and Hard of Hearing communities to those state broadcaster association annual conferences to deepen the dialogue. Mr. Pila moderated both projects.


MAB and NAB were pleased that Annie Urasky of the Michigan Department of Civil Rights joined the MAB board at their August convention in a discussion of the needs and wants of deaf and hard of hearing Michigan citizens. Out of that discussion came opportunities to strengthen engagement on emergency matters and a suggestion for video content, such as public service announcements (PSA), from each group.

The ABA hosted Mr. Steve Hamerdinger of the Alabama Office of Deaf Services for a morning session at its annual conference in Hoover, AL. Mr. Hamerdinger provided excellent suggestions on outreach opportunities in Alabama. One news director in the session reported that he was excited to bring the tips back to his station elsewhere in the state.

As a result of these successful interactions, NAB is working on a model for similar events in other states. NAB is also developing a PSA to facilitate consumer engagement with stations. NAB appreciates the work of Claude Stout of TDI, who provided the contacts for Ms. Urasky and Mr. Hamerdinger.

NAB and its broadcast members are proud of their service to all of their viewers. NAB looks forward to continued engagement on this topic at the Commission, in the DAC and in our local communities.

Respectfully submitted,



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